IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE

DAVID DELL'AQUILA, on behalf of)	
himself and all others similarly situated,)	
)	
Plaintiffs,)	
)	No: 3:19-cv-00679
- against -)	Judge William L. Campbell Jr.
)	
WAYNE LAPIERRE, NATIONAL RIFLE)	Magistrate Judge Jefferey S. Frensley
ASSOCIATION OF AMERICA, and)	
NRA FOUNDATION, INC.)	
)	
Defendants)	

WAYNE LaPIERRE AND NATIONAL RIFLE ASSOCIATION OF AMERICA'S RESPONSE TO PLAINTIFF'S MOTION TO AMEND

Defendants the National Rifle Association of America ("NRA") and Wayne LaPierre, by and through the undersigned counsel, hereby responds to Plaintiff's Motion to Amended the Amended Complaint (D.E. 37). The NRA and Mr. LaPierre take no position on Plaintiff's Motion to Amend. However, the NRA and Mr. LaPierre point out to the Court that Plaintiff has failed to respond the both NRA's and Mr. LaPierre's pending Motions to Dismiss (D.E. 20 and 32). Therefore, in the event the Court denies the Motion to Amend, the Court should grant the Motions to Dismiss.

Dated: January 16, 2020

By: /s/ W. Allen McDonald LACY, PRICE & WAGNER PC W. Allen McDonald 249 N. Peters Rd., Suite 101 Knoxville, TN 37923 (865)-246-0800

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CERTIFICATE OF SERVICE

I do hereby certify that a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's electronic filing system.

Date: January 16, 2020

/s/ W. Allen McDonald
W. Allen McDonald